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IN THE CIRCUIT COURT OF WARREN COUNTY, MISSISSIPPI

LAURA REBECCA BARWICK

NOV 06 2015

PLAINTIFF

VS.

JAN HYLAND DAIGRE, CIRCUIT CLERK

CAUSE NO. 15-0122-CI

WAL-MART STORES, INC.

BY  D.C.

DEFENDANT

COMPLAINT

COMES NOW the Plaintiff, by and through counsel, and files herewith this Complaint against the Defendant, Wal-Mart Stores, Inc., alleging as follows:

1. Complainant, Laura Rebecca Barwick, is an adult resident citizen of Warren County, Mississippi.

2. The Defendant, Wal-Mart Stores, Inc. Is qualified to do business in the State of Mississippi, on whom process may be served by service upon its resident registered agent for process, CT Corporation System, 645 Lakeland Drive East, Suite 101, Flowood, MS 39232.

3. At alltimes herein mentioned, Defendant was engaged in operating and maintaining a retail merchandise and grocery store located on Iowa Boulevard off U.S. Highway 61 South in Vicksburg, Warren County, Mississippi.

4. On November 6, 2012, Plaintiff was a business invitee inside the aforesaid premises. Plaintiff had completed her shopping, checked and paid for the purchased items and walking toward the exit door when she suddenly slipped and fell to the floor, without warning or any fault on the part of Plaintiff.

5. Defendant had a duty to maintain its premises on the date and time of the fall and at the area in which Plaintiff fell, and inn a reasonable sale condition for Plaintiff, its invited customer.

6. Defendant was negligent and violated its duty to Plaintiff in failing to maintain the premises in a reasonably safe condition to exit that caused the Plaitniff to fall; and its failure to

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properly warn Plaintiff of the unsafe condition of a wet, slippery floor that directly and proximately caused Plaintiff to fall injuring herself.

7. As a result of said fall, Plaintiff suffered injuries to her back, hips and legs, which injuries are the direct proximate result of the negligence of the Defendant. As a result of such negligence of the Defendant, Plaintiff has experienced pain and suffering, medical expenses and lost wages and will continue to suffer all of such losses in that the injuries are serious, debilitating and permanent in nature, all as will be accurately shown on at the hearing of this cause.

8. Plaintiff asks that process issue to the Defendant in the time and manner as required by law, demands judgment of and from the Defendant in the total sum that may be within the jurisdictional limits of this Court.

Respectfully submitted this the 6th day of November, 2015.

LAURA REBECCA BARWICK

BY:


WREN C. WAY

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